

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF KENTUCKY)	
POWER COMPANY FOR (1) A GENERAL)	
ADJUSTMENT OF ITS RATES FOR ELECTRIC)	CASE NO.
SERVICE; (2) AN ORDER APPROVING ITS 2017)	2017-00179
ENVIRONMENTAL COMPLIANCE PLAN; (3) AN)	
ORDER APPROVING ITS TARIFFS AND RIDERS;)	
(4) AN ORDER APPROVING ACCOUNTING)	
PRACTICES TO ESTABLISH REGULATORY)	
ASSETS AND LIABILITIES; AND (5) AN ORDER)	
GRANTING ALL OTHER REQUIRED APPROVALS)	
AND RELIEF)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO KENTUCKY LEAGUE OF CITIES

Kentucky League of Cities ("KLC"), pursuant to 807 KAR 5:001, is to file with the Commission the original with six copies in paper medium and an electronic version of the following information. The information requested herein is due on or before October 27, 2017. Responses to requests for information in paper medium shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

KLC shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which KLC fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, KLC shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of Jeffry Pollock (“Pollock Testimony”), page 9.
 - a. Explain whether the witness is aware that on August 8, 2017, Kentucky Power Company (“Kentucky Power”) updated its application to reflect the results of its June 2017 refinancing.
 - b. Provide updates to all testimony and exhibits to reflect the June 2017 refinancing.
2. Refer to the Pollock Testimony. Provide all exhibits in Excel spreadsheet format with all formulas intact and unprotected and with all columns and rows accessible.
3. Refer to the Direct Testimony of Robin Cooper (“Cooper Testimony”), unnumbered pages 3–4, which state that the billing amount for street lighting in

Paintsville, Kentucky, fluctuates monthly, although the outdoor lighting and street lighting tariffs provide for a flat fee.

a. Explain whether Paintsville city officials have investigated the reason for the billing fluctuation and, if they have, what explanation was provided for the fluctuation.

b. State whether the number of streetlights included in each bill remained the same or was different for the months in which Paintsville's street lighting billing amount fluctuated.

c. Explain whether KLC is aware that the Fuel Adjustment Clause, System Sales Clause, Asset Transfer Rider, Big Sandy Retirement Rider, Big Sandy 1 Operation Rider, Purchase Power Adjustment, Environmental Surcharge, and Capacity Charge are included in the calculation of the monthly lighting bill.

d. Explain whether KLC is aware that these riders can fluctuate month to month.



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DATED OCT 17 2017

cc: Parties of Record

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